

introductory clause is important. As best understood, the two production methods referred to are provided in the specification, beginning on column 21, line 63 and continuing through column 23, line 17. In particular, the first production method relates to the use of a "thick" insulating thin film that is subsequently partially etched away. The second production method relates to the use of a diffusion barrier film on an insulating thin film. Both structures are understood as masks that enable selective crystallization of an amorphous silicon layer.

The Applicants also wish to highlight what appears to be a technical discontinuity in the Makita et al. specification. That specification at column 21, starting on line 63 begins by discussing a "masking insulating thin-film," which is not previously discussed in "Example 3" (reference column 18). We find the discussion relating to a "masking insulating thin-film" to be unclear and confusing. Furthermore, we believe that after careful study the Examiner will also find the discussion unclear and confusing. While we hesitate to speculate, because we are responding to a final rejection we believe that we have an obligation to provide at least one possible masking insulating thin-film. Based on the textual content, the masking insulating thin-film appears to be a different film than the silicon oxide film that is continuously formed over the amorphous silicon layer (reference the last line of column 18 through line 5 of column 19).

Finally, the relied upon section of Makita et al. (column 23, lines 18-42) does not provide that a catalyst is introduced into an exposed amorphous silicon layer. While the relied upon section describes adding a catalyst to an amorphous silicon layer using plasma processing, such can be performed on an exposed amorphous silicon layer or through an insulating layer. After careful review, we believe that Makita et al. clearly teaches adding a catalyst through an insulating layer.

The differences between the subject invention and Makita et al. are not subtle, minor, or unimportant. Applicants believe that the teachings of the subject invention can produce more

uniform and better oriented poly-crystalline silicon than that produced according to the teachings of Makita et al.

In view of the foregoing, Applicants respectfully request that the application be reconsidered, that claims 1-19, 22 and 24-41 be allowed, and that the subject application pass to issue. Please charge any insufficiency or credit any overpayment to Deposit Account No. 50-0911.

Respectfully submitted,

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